

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.	15-cv-9903 (GBD)(SN) ECF Case

**PLAINTIFFS' NOTICE OF MOTION FOR ENTRY OF PARTIAL
FINAL DEFAULT JUDGMENTS ON BEHALF OF
BURNETT/IRAN PLAINTIFFS IDENTIFIED AT EXHIBIT A
(*BURNETT / IRAN I*)**

PLEASE TAKE NOTICE that upon the accompanying declaration of Robert T. Haeefe, with exhibits, and the accompanying memorandum of law, the Plaintiffs identified in Exhibit A to the accompanying declaration of Robert T. Haeefe, respectfully move this Court for an Order awarding them (1) solatium damages for the losses they suffered as the immediate family members (in this instance, spouse, parents, children, and siblings) of their decedents (as indicated in Exhibit A) in the same per plaintiff amounts previously awarded by this Court to various similarly situated plaintiffs; (2) compensatory damages for conscious pain and suffering in the same per estate amount previously awarded by this Court regarding other estates of decedents killed in the September 11 attacks; (3) prejudgment interest at the rate of 4.96 percent per annum, compounded annually for the period from September 11, 2001 until the date of the judgment; and (4) permission for the *Burnett* plaintiffs identified in Exhibit A to seek punitive damages and economic and other damages at a later date, and for all other *Burnett* Plaintiffs not appearing on Exhibit A to submit applications for damages awards in later stages.

Plaintiffs request is made in connection with the judgment on default as to liability entered against the Islamic Republic of Iran, the Islamic Revolutionary Guard Corps, and the Central

Bank of the Islamic Republic of Iran (collectively, “the Iran Defendants”) on January 31, 2017. 15-cv-9903 ECF No. 85.

Dated: July 26, 2017

/s/ Robert T. Haefele
Robert T. Haefele, Esq.
MOTLEY RICE LLC
28 Bridgeside Blvd.
Mount Pleasant, SC 29464
Tel: 843-216-9184
Fax: 843-216-9450
Email: rhaefele@motleyrice.com